

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

ILENE RICHMAN, Individually and on Behalf of
All Others Similarly Situated,

Plaintiffs,

v.

GOLDMAN SACHS GROUP, INC., LLOYD C.
BLANKFEIN, DAVID A. VINIAR and GARY D.
COHN,

Defendants.

Civil Action No. 1:10 CIV 3461

(caption continued on subsequent pages)

**NOTICE OF MOTION OF THE INSTITUTIONAL INVESTOR GROUP FOR (1)
CONSOLIDATION; (2) APPOINTMENT AS LEAD PLAINTIFF; AND (3) APPROVAL
OF LEAD PLAINTIFF'S CHOICE OF CO-LEAD COUNSEL**

HOWARD SORKIN, Individually and on Behalf
of All Others Similarly Situated,

Plaintiffs,

v.

GOLDMAN SACHS GROUP, INC., LLOYD C.
BLANKFEIN, DAVID A. VINIAR and GARY D.
COHN,

Defendants.

Civil Action No. 1:10 CIV 3493

DR. EHSAN AFSHANI, On Behalf of Himself and
All Others Similarly Situated,

Plaintiffs,

v.

GOLDMAN SACHS GROUP, INC., LLOYD C.
BLANKFEIN, DAVID A. VINIAR and GARY D.
COHN,

Defendants.

Civil Action No. 1:10 CIV 3616

LOUIS GOLD, Individually and on Behalf of All
Others Similarly Situated,

Plaintiffs,

v.

GOLDMAN SACHS GROUP, INC., LLOYD C.
BLANKFEIN, DAVID A. VINIAR and GARY D.
COHN,

Defendants.

THOMAS DRAFT, Individually and on Behalf of
All Others Similarly Situated,

Plaintiffs,

v.

GOLDMAN SACHS GROUP, INC., LLOYD C.
BLANKFEIN, DAVID A. VINIAR, GARY D.
COHN and SARAH E. SMITH,

Defendants.

No. 1:10 CV 4786

No. 1:10 CV 4812

PLEASE TAKE NOTICE that on a date and at a time designated by the Court, before the Honorable Paul A. Crotty, at the United States District Court for the Southern District of New York, located at the United States Courthouse, 500 Pearl Street, Courtroom 15C, New York, New York, the Institutional Investor Group will respectfully move this Court, pursuant to Section 21D(a)(3)(B) of the Securities Exchange Act of 1934 (“Exchange Act”), 15 U.S.C. § 78u-4(a)(3)(B), as amended by the Private Securities Litigation Reform Act of 1995 (the “PSLRA”), for entry of an Order appointing the Institutional Investor Group as Lead Plaintiff in the above-captioned actions, approving its choice of law firms of Bernstein Litowitz Berger & Grossmann LLP and Grant & Eisenhofer P.A. as Co-Lead Counsel for the Class, and consolidating all related actions herewith under Rule 42(a) of the Federal Rules of Civil Procedure. The Institutional Investor Group intends to demonstrate that it satisfies the relevant requirements of the PSLRA and, thus, should be appointed Lead Plaintiff.

This motion is based upon this Notice of Motion, the accompanying Memorandum of Law in support thereof, the Declaration of Gerald H. Silk filed herewith, the pleadings and other files herein, and such other written or oral argument as may be permitted by the Court.

WHEREFORE, the Institutional Investor Group respectfully requests that the Court: (1) appoint the Institutional Investor Group as Lead Plaintiff pursuant to the PSLRA; (2) approve its selection of Co-Lead Counsel for the Class; (3) consolidate all related actions; and (4) grant such other and further relief as the Court may deem just and proper.

DATED: June 25, 2010
New York, New York

Respectfully submitted,

**BERNSTEIN LITOWITZ BERGER
& GROSSMANN LLP**

By: /s/ Gerald H. Silk
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